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December 5, 2016

Marlene Dortch
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: GN Docket No. 16-142, ATSC 3.0

Dear Ms. Dortch:

On December 1, 2016, Stacy Fuller, Cathy Carpino, and the undersigned, all of AT&T Services, Inc. (AT&T), and Alison Minea, of DISH Network L.L.C. (DISH), met with William Lake, Michelle Carey, Martha Heller, Evan Morris, Evan Baranoff, Kim Matthews, Steve Broeckaert, John Wong, Sean Yun, John Gabrysch (by phone), Sean Mirzadegan, and Kathy Berthot, all of the Media Bureau; and Paul Murray, Barbara Pavon, Mark Colombo, Matthew Hussey, and Walter Johnston, all of the Office of Engineering and Technology.

During the meeting, AT&T and DISH discussed the broadcasters' proposed transition to ATSC 3.0 and the resulting economic and technical implications for DBS providers. AT&T and DISH urged the FCC to indicate that, as a guiding principle, no new burdens would be imposed on MVPDs as a result of the transition. As the beneficiaries of this new standard, broadcasters should be the entities that bear the costs of implementation, not MVPDs. Although the broadcasters expressed that the transition should be voluntary, the FCC should establish rules to ensure that, among other things, broadcasters cannot use the retransmission consent process to require MVPDs to carry the ATSC 3.0 signal.

AT&T and DISH noted that carriage of an ATSC 3.0 signal would require new equipment at each local receive facility and could potentially require new consumer set-top boxes. Because many aspects of the ATSC 3.0 standard have yet to be finalized and approved, it is difficult to predict at this time the cost of new or modified equipment, let alone test such equipment to verify compatibility with our platforms.

AT&T and DISH also discussed the significant capacity concerns associated with transitioning to the ATSC 3.0 standard. We explained that the bandwidth required to carry one ATSC 3.0 4K channel, for example, will consume substantially more bandwidth than a current HD channel, let alone the bandwidth that would be required to carry both an ATSC 3.0 4K signal and an ATSC 3.0 signal. Such increased carriage obligations would put at risk our ability to comply with the FCC's must carry rules.

Finally, AT&T and DISH specified that DBS providers should not be required to pass through any of the several additional data streams enabled by the ATSC 3.0 format, which would only add to the existing capacity constraints on DBS providers.



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In light of the issues noted above, among others, and of the fact that the ATSC 3.0 standard has not been finalized yet, the DBS providers noted that an NOI is the more appropriate vehicle at this time for the FCC to fully address the implications of this proposed transition. Please do not hesitate to contact me with any questions.

Sincerely,

/s/ Brendan F. Haggerty

Brendan F. Haggerty

Attachments

cc: William Lake
Michelle Carey
Martha Heller
Evan Morris
Evan Baranoff
Kim Matthews
Steve Broeckaert
John Wong
Sean Yun
John Gabrysch
Sean Mirzadegan
Kathy Berthot
Paul Murray
Barbara Pavon
Mark Colombo
Matthew Hussey
Walter Johnston